

## REMARKS

Claims 1-13 are pending herein, with Claim 1 being an independent claim. Claims 14-21 have been withdrawn. Claims 1-12 have been rejected. Claim 13 has been objected to.

### 35 U.S.C. § 102

Claims 1, 5, 6, 11, and 12 were rejected under 34 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 3,698,601 to Sierk, et al. Sierk was described as having a turret frame 2, a turret plate 16, 17, a pair of first female connectors 23, 25, 26, 27, and a pair of second male connectors 18.

In response to the previous office action, the Applicant traversed the rejection. The Applicant pointed out that independent Claim 1 specifically states as follows:

said turret shaft comprising a pair of first connectors attached to said turret frame and a pair of second connectors attached to said turret plate, said first and said second connectors releaseably mating therewith.

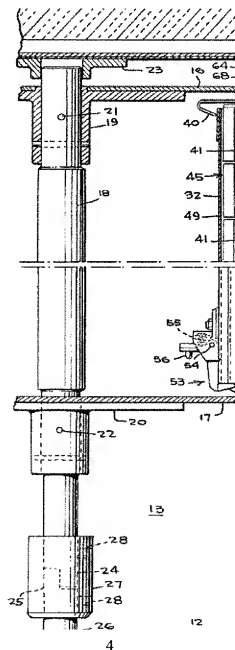
The Applicant pointed out that Sierk attaches the turret plate 15, 17 to a shaft 18 via a number of hub members 19, 20. As such, there are no connectors attached to the turret plate as is called for in the claim.

In response, the Examiner stated as follows:

It is the opinion of the examiner that the edges of the shaft 18, attached to the plates by way of the hubs, which project beyond the plates act as a male connector. The shaft edges in turn mate with female connectors, including first connector 23 and stepped ends 24, 25. The female connectors are attached to the frame in some form or the other. Thus, with the broad recitation of connectors, Sierk discloses all of the claimed subject matter.

Office Action at 5.

The Applicant continues to traverse the rejection. The Examiner's statement above concedes that there is no connector mating with the so called first connector 23, only the shaft 18. The shaft 18, however, is a separate element from anything that can be considered a connector. As such, the second connector is admittedly missing from the reference. The fact that the female connectors are attached "in some form or the other" simply does not read on the claimed first and second connectors.



The Applicant thus submits that independent claim 1, and the dependent claims thereon, are patentable over the cited reference without the second connector. More than simply a shaft is called for in the claims.

The Applicant further notes that there are no connectors attached to the plates 16, 17. Rather, the plates are attached to the shaft 18 via the hubs 19, 20 along with the pins, 21, 22. Again, the reference simply does not provide the connectors as called for in the claim. The Applicant thus further asserts that the claims are patentable over the cited reference.

Given this construction of Sierk described above, the Applicant adopts the previous traversals of the remaining rejections based on Sierk in combination with other references.

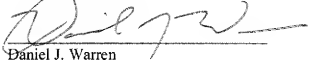
#### **Amendment**

The Applicant hereby withdraws the priority claim to U.S. Patent Application Serial No. 10/076,643, now U.S. Patent No. 6,786,134. The Applicant requests entry of the amendment so as to place this case in condition for appeal if necessary.

## CONCLUSION

The Applicant believes it has responded to each matter raised in the Office Action. Allowance of all claims is respectfully solicited. Any questions may be directed to the undersigned at 404-853-8028.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read 'D. Warren', is written over a horizontal line.

Daniel J. Warren  
Reg. No. 34,272

**SUTHERLAND ASBILL & BRENNAN LLP**

999 Peachtree Street, N.E.  
Atlanta, Georgia 30309-3996  
(404) 853-8000  
(404) 853-8806 (Facsimile)  
daniel.warren@sablalaw.com

SAB Docket No. 25040-1166